

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA

JANE ROE 1 AND JANE ROE 2 on behalf of
themselves and on behalf of other similarly
situated individuals, and DREAMGIRLS AT
FOX'S LLC, a Washington Limited Liability
Corporation

Plaintiffs,

vs.

JULIE ANDERSON, Pierce County Auditor,
PIERCE COUNTY, a county in the State of
Washington, and DAVID VAN VLEET

Defendants.

Cause No. 3:14-cv-05810

**DECLARATION OF MARY
MARGARET KELLY**

Mary Margaret Kelly declares and certifies as follows:

1. I am a Licensed Private Investigator and Agency Principal of Joseph Daniel & Meyer, Inc., an AZ corporation, AZ DPS License 1001031. I have been a private investigator for 35 years. My agency has six associates, offices in three AZ cities and contracts with Maricopa, Mohave, Pima Counties along with working as a court appointed investigator through the Criminal Justice Act (CJA) in the federal courts. In addition to contract work, JD&M has private retained clients.

DECLARATION OF MARY MARGARET
KELLY - 1

1 2. As a private investigator, I am often required to locate witnesses and other individuals
 2 who are sometimes difficult to locate. As such, I am familiar with various electronic data bases
 3 that can be employed to ascertain someone's personal information such as an addresses and
 4 telephone numbers, given a limited amount of information about that individual. A number of
 5 these data bases are easily accessible to members of the general public. I am familiar with the
 6 means of obtaining electronic records in States other than Arizona as I am often required to
 7 locate out of State records.

8 3. I was asked by attorney Gilbert H. Levy to ascertain how easily identifiers and
 9 personal information might be obtained by any person with average computer skills and relative
 10 to the State of Washington once given an individual's name and date of birth.

11 4. The State of Washington is one of the more open records states in the country. Unlike
 12 states such as Wyoming wherein public records are available but only by written request, WA
 13 State has open records for all its counties. If an individual "Googles" *"Open Records*
 14 *Washington State"* one will find thousands of links. Likely the most comprehensive link for
 15 WA State is **brbpub.com** which appears on the first page of the Google search.

16 5. brbpub.com offers access to all WA State Counties and access to business entities,
 17 delinquent taxpayers (addresses included), district and municipal court indexes and calendars,
 18 drivers status display (verify drivers licenses & other permits), inmates, business records, state
 19 archives, UCCs (by name), court records among other agencies. From the county recorders'
 20 offices one can search for property ownership, liens, IRS liens and judgments along with filings
 21 resulting from DES (child support) and restitution liens. All aforementioned county recordings
 22 contain physical addresses.
 23

DECLARATION OF MARY MARGARET
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Gilbert H. Levy

Attorney at Law
 2003 Western Avenue, Ste 330
 Seattle, Washington 98121
 (206) 443-0670 Fax: (206) 448-2252

1 6. Once in possession of an individual's name and date of birth and if interested in a more
2 intrusive search, most private investigators as well as property managers have access to paid data
3 bases wherein for \$1.00 on account, the social security number along with immediate family
4 members, liens and judgments, bankruptcies and utilities along with telephone numbers are
5 identified. Any citizen can hire a local private investigator for \$50 to \$100 to buy such a search.

6 7. One can also find out a great deal of information about an individual accessing social
7 media sites such as Facebook, Twitter, and Instagram using only the person's name. For
8 example, by accessing these sites, one can often learn the identities of a person's friends and
9 family members.

10 8. Based upon the foregoing it is my opinion and belief that it is often possible for the
11 average person with an average amount of computer skill to obtain a great deal of personal
12 information about an individual, if they are only given their name and date of birth.

13 I hereby declare under penalty of perjury of the laws of United States of America that the
14 foregoing is true and correct.

15 Dated this 13th day of October, 2014, in Phoenix Arizona.

16
17 /s/ Mary Margaret Kelly
18 Mary Margaret Kelly
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CERTIFICATE OF SERVICE

I certify that on October 14, 2014, I caused to be electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the attorney(s) of record.

I further certified that on this date I caused a copy of the foregoing to be delivered to Defendant David Van Vleet by mailing the same to him by United States Mail, postage pre-paid at the following address: Post Office Box 2277, Auburn WA 98071-2277.

/s/Gilbert H. Levy
Gilbert H. Levy WSBA# 4805
Attorney for Plaintiffs

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